

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WINNIFRIED NOEL CHARLES,

Plaintiff,

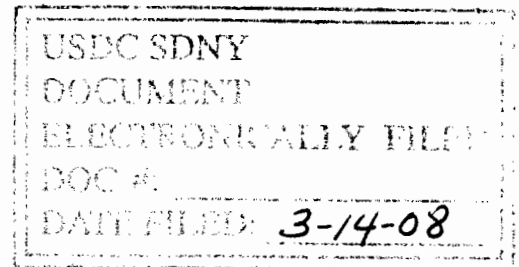
- against -

MICHAEL CHERTOFF, Secretary of the  
Department of Homeland Security, in his official  
capacity, ENRICA TROY, MARY ANN GANTNER,  
and the DEPARTMENT OF HOMELAND SECURITY,

Defendants.  
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NOTICE OF MOTION

07 CV 08324 (JSR)



PLEASE TAKE NOTICE that, upon the Affidavit Michael P. Mangan, together with the exhibits thereto, and upon the accompanying Memorandum of Law in Support of the Motion for Leave to Amend the Complaint, Plaintiff Winnifried Noel Charles will move this Court before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Courthouse of located at 500 Pearl Street, New York, New York, on a date convenient for the Court, for an order pursuant to Fed. R. Civ. P. 15(a), to grant Plaintiff leave to amend her Complaint.

Dated: New York, New York  
February 28, 2008

Respectfully submitted,

/s/

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Michael P. Mangan (MM-5773)  
80 Wall Street, Suite 1214  
New York, New York 10005  
Phone: (212) 248-2171  
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Under the  
case management  
plan previously entered  
in this, the unnecessary  
motion is hereby granted  
and the Clerk is directed to  
docket the Amended Complaint.

SO ORDERED  
Jed S. Rakoff  
USDC SDNY 3-12-08